



November 21, 1991

In Reply
Refer To: HW-113

Robert L. Geddes
Senior Environmental Engineer
Monsanto Chemical Company
P.O. Box 816
Soda Springs, ID 83276

Subject: Phase 1 Remedial Investigation/Feasibility Study Work
Plan for the Monsanto Soda Springs Facility

Dear Mr. Geddes:

The purpose of this letter is to transmit the U.S. Environmental Protection Agency (EPA) approval of the Phase 1 Remedial Investigation/Feasibility Study (RI/FS) Work Plan for the Monsanto Soda Springs Facility. The Phase 1 RI/FS Work Plan submitted on October 10, 1991 is approved subject to the modifications, assumptions, and understandings discussed below.

A written response to this letter must be submitted by December 13, 1991, indicating Monsanto's agreement with each point. Where a revision or additional information is sought, the revised portions or a timely submission schedule should be included. If Monsanto has any different understanding of any matter in this letter, such differences should be brought to my attention immediately in writing.

This letter also serves to confirm EPA's earlier verbal approval of the Phase 1 groundwater and surface soil sampling portion of the work plan. While EPA was completing its review of the revised work plan, EPA gave Monsanto verbal approval to proceed with portions of the work plan to allow sampling to be completed before weather conditions became too severe.

RI/FS Work Plan Modifications, Assumptions, and Understandings

The Phase 1 RI/FS Work Plan submitted on October 10, 1991 is approved subject to the following modifications, assumptions, and understandings:

- 1) Based on phone conversations with David Banton of Golder and Associates on behalf of Monsanto, Polonium²¹⁰ will be added to the list of Radiological Parameters of interest in sediment, soil and source

AR

2.1 0002

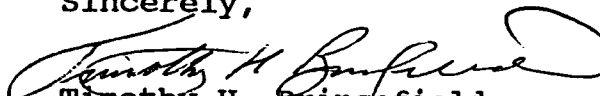
6301

material samples (Tables 6-3, 6-4 and 6-8). Revised tables must be submitted to EPA.

- 2) Also based on phone conversations with David Banton, the QA methods for Radionuclides will be somewhat different from the reference methods currently described in Table 7-2 of the QA plan, but will be consistent with approved EPA methods. A revised Table 7-2 must be submitted to EPA.
- 3) While EPA agrees with the statement on page 35 that no location-specific ARARs are known to be germane to the Monsanto site at this time, acceptance of that statement does not rule out the possibility of re-evaluating location-specific ARARs at a later date based on additional information. All preliminary ARAR evaluations discussed in the work plan will be reviewed and revised (if necessary) based on information gathered throughout the RI/FS process as described in Sections 6.1.9 and 6.2.6.
- 4) In Section 5.5, page 44, it is stated that data set continuity will be determined to exist if project data corresponds to historical concentrations or trends, and that a review of sampling, analytical and quality control will be conducted. Monsanto must describe how and when data will be validated.
- 5) EPA understands from phone conversations with both David Banton and Monsanto that all available data qualifiers and quality assurance information will be added to the Water Quality Data Base in Appendix C and submitted to EPA with the Preliminary Site Characterization report, or sooner if possible.
- 6) In phone conversations with EPA during the recent sampling event, David Banton indicated that the Project Schedule (Table 20) may require some slight modification from the October 10, 1991 schedule due to changes in the soil sampling locations. The Work Plan is approved based on the October 10, 1991 schedule, but EPA will consider proposed schedule changes if Monsanto deems them necessary.
- 6) In Section 6.1.5, page 52, air dispersion modelling has been included in the revised plan for dust and stack emissions associated with the site. While this is generally acceptable, Monsanto should identify the model to be used for this exercise, and any modelling plans must undergo EPA review to assure use of acceptable models and guidance.

Thank you for your diligent efforts to improve earlier drafts and complete the work plan. I believe our future work will go more smoothly and quickly. If you have any questions about this letter or other issues, please do not hesitate to call me at (206) 553-2100.

Sincerely,



Timothy H. Brincefield
Superfund Project Manager

cc: Kevin Oates, EPA Superfund
Charles Ordine, EPA ORC
Christine Psyk, EPA Superfund
Lorraine Edmond, EPA ESD
Don Matheny, EPA ESD
Mike Watson, EPA ESD
Boyd Roberts, IDHW
Mike Thomas, IDHW
Gordon Brown, IDHW
Jim Eldridge, SAIC
David Banton, Golder Associates